

1 BILAL A. ESSAYLI
Acting United States Attorney
2 CHRISTINA T. SHAY
Assistant United States Attorney
3 Chief, Criminal Division
SONAH LEE (Cal. Bar No. 246024)
4 Assistant United States Attorney
Riverside Office
5 3403 Tenth Street, Suite 200
Riverside, California 92501
6 Telephone: (951) 276-6924
Facsimile: (951) 276-6202
7 Email: sonah.lee@usdoj.gov

8 Attorneys for Plaintiff
UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSE FRANCISCO CIRENIO-MARCOS,

15 Defendant.
16

No. ED CR 25-00241-WLH

NOTICE OF MOTION AND MOTION TO
DISMISS WITHOUT PREJUDICE
INDICTMENT PURSUANT TO FEDERAL
RULE OF CRIMINAL PROCEDURE 48(a)

17 Pursuant to Federal Rule of Criminal Procedure 48(a), the United
18 States of America, by and through its counsel of record, the Acting
19 United States Attorney for the Central District of California and
20 Assistant United States Attorney Sonah Lee, hereby moves to dismiss
21 without prejudice its indictment against defendant Jose Francisco
22 Cirenio-Marcos ("defendant").

23 Following defendant's release on bond, defendant was arrested by
24 Immigration and Customs Enforcement and removed from the United
25 States.

26 The United States moves to dismiss the indictment against
27 defendant in the interests of justice under Federal Criminal Rule
28 48(a), and therefore respectfully requests that the Court grant its

1 motion to dismiss the indictment without prejudice. Additionally,
2 the Court should exonerate the bond for defendant.

3 On August 25, 2025, Deputy Federal Public Defender Chad
4 Pennington, counsel for defendant, indicated that defendant does not
5 oppose this motion but requests that the indictment be dismissed with
6 prejudice.

7 Dated: August 26, 2025

Respectfully submitted,

8 BILAL A. ESSAYLI
Acting United States Attorney

9 CHRISTINA T. SHAY
10 Assistant United States Attorney
11 Chief, Criminal Division

12 /s/ Sonah Lee
SONAH LEE
Assistant United States Attorney

13
14 Attorneys for Plaintiff
UNITED STATES OF AMERICA